

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 18342 and 18515

**DECLARATION OF NAYUAN ZOUAIRABANI IN CONNECTION WITH THE DRA
PARTIES' REPLY MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION *IN*
LIMINE TO EXCLUDE CERTAIN TESTIMONY
OFFERED BY DEBTORS' PLAN EXPERT MARTI P. MURRAY**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

I, Nayuan Zouairabani, declare:

1. I am an Income Member at McConnell Valdés, counsel to the DRA Parties. I submit this declaration in connection with the *DRA Parties Reply Memorandum of Law in Support of their Motion in Limine to Exclude Certain Testimony Offered by Debtors' Plan Expert Marti P. Murray*.
2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the October 13, 2021 transcript of the Remote Video-Recorded Deposition of Marti P. Murray.
3. I declare under penalty of perjury that the foregoing is true and correct.

Executed On: October 22, 2021

/s/ Nayuan Zouairabani

Nayuan Zouairabani

USDC No. 226411

Email: nzt@mcvpr.com